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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH CENTRAL DIVISION

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UNITED STATES OF AMERICA,	:	DEFENDANT CARSON-SELMAN
Plaintiff,	:	REQUEST FOR INTERNATIONAL JUDICIAL
vs.	:	ASSISTANCE (LETTER ROGATORY) FOR
	:	CHIHYON REVELES
RICHARD CARSON-SELMAN, et al.,	:	Case No. 2:07CR286
Defendants.	:	Magistrate Judge Samuel Alba

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The United States District Court, District of Utah, presents its compliments to the appropriate judicial authority of the Republic of Korea and requests international judicial assistance to conduct depositions of witnesses to be used in a criminal proceeding before this court in the above captioned matter, US v. Lombardo, et al., United States District Court, District of Utah. No trial date has been set.

This court requests the assistance described herein as necessary in the interests of justice. The assistance requested is that the appropriate judicial authority of the Republic of Korea compel the appearance of the below named individual to be deposed in keeping with the customs of the Republic

**EXHIBIT** 2

of Korea. We would conduct the deposition at whatever site the judicial authority of the Republic of Korea deems appropriate.

Reveles, Chihyon  
Citizen of the Republic of Korea  
address:  
Reveles, Chihyon  
415 Hangang Daewoo Apt., 103-2102  
E-Chon Dong, Yongsan Gu  
Seoul 140-031, Korea

The United States government is alleging in this matter that there been a violation of :

1962(d) Title 18 U.S.C. – Racketeering Conspiracy

1344 Title 18 U.S.C. – Bank Fraud

1084 Title 18 U.S.C. – Transmission of Wagers/Wagering Information

1956 Title 18 U.S.C. – Money Laundering

1963 Title 18 U.S.C. – RICO Forfeiture

The factual basis for the complaint is an allegation of fraudulent conduct by defendants as regards the handling and processing of Visa and Mastercard Transactions in order to aid offshore gaming establishments. The United States government alleges that defendant Richard Carson-Selman, along with other defendants, engaged in a racketeering conspiracy in order to aid offshore gaming establishments in violation of the aforementioned sections of Title 18 of the United States Code.

The witness named above may provide potentially exculpatory testimony for defendant Richard Carson-Selman (and others charged in this case) with respect to all allegations that the government has made against the defendant, including but not limited to any aiding and abetting theories advanced by the government.

The witness heretofore named has filed a declaration describing his expected testimony and he has agreed to give depositions in the Republic of Korea. He is a citizen of the Republic of Korea.

It will be requested that the deposition be videotaped and counsel be allowed to prepare and ask questions by way of telephone hookup. If counsel's presence is required, then of course counsel will arrange to appear in the Republic of Korea.

We would request designation of an appropriate official as to when scheduling of the deposition(s) may be arranged. The attorney requesting the deposition is:

Michael Pancer, Attorney for Defendant Richard Carson-Selman  
105 W. F St., 4th Fl., San Diego, CA 92101  
Phone: (619) 236-1826

This request was joined by:

D. Gilbert Athay, Attorney for Defendant Baron Lombardo  
43 E. 400 South, Ste. 325, Salt Lake City, UT 84111-2767  
Phone: (801) 363-7074

David V. Finlayson, Attorney for Defendant Count Lombardo  
43 E. 400 South, Salt Lake City, UT 84111  
Phone: (801) 220-0700

Fred D. "Pete" Gibson, III, Attorney for Defendant Henry Bankey  
Lionel Sawyer & Collins, 1700 Bank of America Plaza  
300 S. Fourth St., Ste. 1700, Las Vegas, NV 89101  
Phone: (702) 383-8929

Scott C. Williams, Attorney for Defendant Tina Hill  
43 E. 400 South, Salt Lake City, UT 84111  
Phone: (801) 220-0700

This court would appreciate assistance and would provide similar assistance to the Republic of Korea.

The court understands that there may be costs involved in fulfilling this request. The appropriate judicial authorities and the Minister of Justice for the Republic of Korea will be reimbursed for costs incurred in executing this letter rogatory.

Dated: \_\_\_\_\_

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Magistrate Judge Samuel Alba  
United States District Court, District of Utah  
Salt Lake City, Utah, USA